## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AEROGLOBAL CAPITAL MANAGEMENT, LLC., a Delaware Limited Liability Company,

Plaintiff.

C.A. NO. 02-CV-5311

v.

CIRRUS INDUSTRIES, INC., a Delaware Corporation, CIRRUS HOLDING COMPANY LIMITED, a Cayman Islands Corporation, CRESCENT CAPITAL INVESTMENTS, INC., a Delaware Corporation, FIRST ISLAMIC INVESTMENT BANK, E.C., a Bahrain Investment Bank, ALAN L. KLAPMEIER, DALE E. KLAPMEIER, PETER P. McDERMOTT, II, JOHN N. DYSLIN, SIMA GRIFFITH, MARWAN ATALLA, WILLIAM J. MIDON AND WILLIAM C. WOOD,

JURY TRIAL DEMANDED

Defendants.

## <u>AFFIDAVIT OF ALAN L. KLAPMEIER</u>

STATE OF MINNESOTA	)	
	)	ss:
COUNTY OF ST. LOUIS	)	

Alan L. Klapmeier, being first duly sworn upon oath, states and alleges as follows:

- 1. I am the Chief Executive Officer and President of Cirrus Industries, Inc. My brother, Dale Klapmeier, and I founded the company in 1984 in Baraboo, Wisconsin. I submit this affidavit based on my personal knowledge.
- 2. Cirrus' headquarters are in Duluth, Minnesota. I reside near Duluth, Minnesota.
  - 3. I own no property in Pennsylvania and conduct no personal business there. I

have only visited Pennsylvania on a few occasions.

- Cirrus advertises its airplanes in national publications but Cirrus has made no 4. specific effort to sell airplanes in Pennsylvania.
- In 2001, I, as a representative of Cirrus, engaged in discussions with AeroGlobal Capital Management, LLC and its representatives regarding AeroGlobal making an investment in Cirrus. These discussions took place in person in Chicago, Illinois, Duluth, Minnesota, Newport, Rhode Island, and Oshkosh, Wisconsin. No meetings were held in Pennsylvania.
- To my knowledge, I have never called a Pennsylvania telephone number to reach Craig Millard, Christopher Moe, Ralph Isham, Keith Fitzgerald, or AeroGlobal.
- I have not been in Pennsylvania in connection with AeroGlobal, Crescent 7. Capital or Cirrus.

FURTHER AFFIANT SAITH NOT.

Alan L. Klapmeier

Subscribed and sworn to before me this IX day of Normall, 2002.